

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

---

**In re:**

**1121 PIER VILLAGE LLC,  
PENN TREATY HOMES LLC,  
2626 FRANKFORD LLC,  
285 KINGSLAND LLC,  
231 E 123 LLC,  
193 HANCOCK LLC,**

**Debtors.**

---

:  
:  
: **Chapter 11**  
:  
: **Lead Case No. 21-11466-ELF**  
:  
: **Jointly Administered**  
:  
: **Hearing Date: September 27, 2021**  
: **Hearing Time: 9:00 a.m.**  
: **Hearing Place: Courtroom #1**  
:  
:

**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

1121 Pier Village LLC, Penn Treaty Homes LLC and 2626 Frankford LLC (the “Debtors”), by and through their counsel, Obermayer Rebmann Maxwell & Hoppel, LLP, have filed a Motion for Entry of an Order Granting (a) Debtors Authority to Obtain Post-petition Financing on Terms Described Herein, (b) Granting Post-petition Lender Liens and Super-priority Administrative Expense Status Pursuant to 11 U.S.C. §§ 364(c)(1), (2) and (3) and 364(d) of title 11 of United States Code, (c) Granting Relief from Automatic Stay Pursuant to Section 362 of the Bankruptcy Code and (d) Authorizing Debtors to Enter into Agreements with an Entity Associated with 724 Group Investments, LLC and DIO Industrials LLC (the “Motion”).

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case (if you do not have an attorney, you may wish to consult an attorney).

1. If you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Motion, then on or before **September 15, 2021** you or your attorney must do all of the following:

(a) File an answer explaining your position at the United States Bankruptcy Court, 900 Market Street, Suite 400, Philadelphia, PA 19107-4299

If you mail your answer to the bankruptcy clerk’s office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) Mail a copy to the attorney for the Movant:

Edmond M. George, Esquire  
OBERMAYER REBMANN MAXWELL & HIPPEL, LLP  
Centre Square West, Suite 3400  
1500 Market Street  
Philadelphia, PA 19102  
Telephone: (215) 665-3140  
Facsimile: (215) 665-3165

2. If you or your attorney do not take the steps described above and attend the hearing, the Court may enter an Order granting the relief requested in the Motion.

3. A hearing on the Motion is scheduled to be held before the Honorable Eric L. Frank on **September 27, 2021 at 9:00 a.m.**, in Courtroom #1, U.S. Bankruptcy Court, 900 Market Street, Philadelphia, PA 19107-4299.

4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's Office at 215-408-2800 to determine whether the hearing has been canceled because no one filed a response thereto.

Dated: September 1, 2021

By: /s/ Michael D. Vagnoni  
Edmond M. George, Esquire  
Michael D. Vagnoni, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
Centre Square West  
1500 Market Street, Suite 3400  
Philadelphia, PA 19102  
Telephone: (215) 665-3140  
Facsimile: (215) 665-3165  
*Proposed Counsel to the Debtors*